

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT TESLA, INC.'S MOTION
TO RETAIN CONFIDENTIALITY**

Date: January 8, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

[PROPOSED] ORDER

Pursuant to Local Rules 7-11 and 79-5, as well as this Court's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz have filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibits 1 through 46 to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion to Retain Confidentiality. According to the declaration filed by Plaintiffs' counsel, Lawrence Organ, in support of this Motion, Exhibits 1 through 46 should be sealed for the foregoing reasons:

Exhibit	Bates Number	Basis for Sealing
1	TESLA0000185-186	Marked confidential pursuant to Protective Order (Dkt. No. 50).
2	TESLA0000140-142	Marked confidential pursuant to Protective Order (Dkt. No. 50).
3	TESLA0000004-8	Marked confidential pursuant to Protective Order (Dkt. No. 50).
4	TESLA0000805-808	Marked confidential pursuant to Protective Order (Dkt. No. 50).
5	TESLA0000844-849	Marked confidential pursuant to Protective Order (Dkt. No. 50).
6	TESLA0000889	Marked confidential pursuant to Protective Order (Dkt. No. 50).
7	TESLA0000211-9	Marked confidential pursuant to Protective Order (Dkt. No. 50).
8	TESLA0000308	Marked confidential pursuant to Protective Order (Dkt. No. 50).
9	TESLA0000663	Marked confidential pursuant to Protective Order (Dkt. No. 50).
10	TESLA0000518	Marked confidential pursuant to Protective Order (Dkt. No. 50).
11	TESLA0000863-878	Marked confidential pursuant to Protective Order (Dkt. No. 50).
12	TESLA0000702-703	Marked confidential pursuant to Protective Order (Dkt. No. 50).
13	TESLA0000309	Marked confidential pursuant to Protective Order (Dkt. No. 50).
14	TESLA0000905-1013	Marked confidential pursuant to Protective Order (Dkt. No. 50).

1	15	TESLA0000063-5	Marked confidential pursuant to Protective Order (Dkt. No. 50).
2	16	TESLA0000175	Marked confidential pursuant to Protective Order (Dkt. No. 50).
3	17	TESLA0000200	Marked confidential pursuant to Protective Order (Dkt. No. 50).
4	18	TESLA0000309	Marked confidential pursuant to Protective Order (Dkt. No. 50).
5	19	TESLA0000371	Marked confidential pursuant to Protective Order (Dkt. No. 50).
6	20	TESLA0000389	Marked confidential pursuant to Protective Order (Dkt. No. 50).
7	21	TESLA0000299	Marked confidential pursuant to Protective Order (Dkt. No. 50).
8	22	TESLA0000408-421	Marked confidential pursuant to Protective Order (Dkt. No. 50).
9	23	TESLA0000422-466	Marked confidential pursuant to Protective Order (Dkt. No. 50).
10	24	TESLA0000467-481	Marked confidential pursuant to Protective Order (Dkt. No. 50).
11	25	TESLA0000676	Marked confidential pursuant to Protective Order (Dkt. No. 50).
12	26	TESLA0000679	Marked confidential pursuant to Protective Order (Dkt. No. 50).
13	27	TESLA0000684	Marked confidential pursuant to Protective Order (Dkt. No. 50).
14	28	TESLA0000686	Marked confidential pursuant to Protective Order (Dkt. No. 50).
15	29	TESLA0000688	Marked confidential pursuant to Protective Order (Dkt. No. 50).
16	30	TESLA0000716	Marked confidential pursuant to Protective Order (Dkt. No. 50).
17	31	TESLA0000725	Marked confidential pursuant to Protective Order (Dkt. No. 50).
18	32	TESLA0000729	Marked confidential pursuant to Protective Order (Dkt. No. 50).
19	33	TESLA0000751	Marked confidential pursuant to Protective Order (Dkt. No. 50).
20	34	TESLA0000762	Marked confidential pursuant to Protective Order (Dkt. No. 50).
21	35	TESLA0000776-8	Marked confidential pursuant to Protective Order (Dkt. No. 50).
22	36	TESLA0000779-801	Marked confidential pursuant to Protective Order (Dkt. No. 50).
23	37	TESLA0000802	Marked confidential pursuant to Protective Order (Dkt. No. 50).

38	TESLA0000805-8	Marked confidential pursuant to Protective Order (Dkt. No. 50).
39	TESLA0000809-15	Marked confidential pursuant to Protective Order (Dkt. No. 50).
40	TESLA0000818	Marked confidential pursuant to Protective Order (Dkt. No. 50).
41	TESLA0000819-824	Marked confidential pursuant to Protective Order (Dkt. No. 50).
42	TESLA0000842-3	Marked confidential pursuant to Protective Order (Dkt. No. 50).
43	TESLA0000844-51	Marked confidential pursuant to Protective Order (Dkt. No. 50).
44	TESLA0000825-41	Marked confidential pursuant to Protective Order (Dkt. No. 50).
45	TESLA0000852-62	Marked confidential pursuant to Protective Order (Dkt. No. 50).
46	TESLA0000879-88	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Appearing the requested relief is warranted, this Court orders that:

1. Plaintiffs' Administrative Motion to File Documents Under Seal in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion to Retain Confidentiality is GRANTED.

2. The physical copies in the Court's files of Exhibits 1 through 46 to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion to Retain Confidentiality shall be SEALED and remain sealed until further order of the Court.

IT IS SO ORDERED.

DATED: _____, 2019

The Honorable William Orrick
United States District Court Judge